

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUSTEES OF THE NATIONAL ELEVATOR  
INDUSTRY PENSION, HEALTH BENEFIT  
AND EDUCATIONAL FUNDS,

Plaintiffs,

V.

AL'AN EL MAINTENANCE CORP.

Defendant.

CIVIL ACTION NO. 02-4351

### PRAECIPE FOR ENTRY OF DEFAULT

TO THE CLERK:

Please enter default pursuant to Rule 55(a) of the Federal Rules of Civil Procedure in favor of Plaintiffs and against the Defendant, Al’An El Maintenance in the above-captioned matter for failure to plead or otherwise defend in answer to the Plaintiff’s Complaint, and for failure to appear.

Defendant was properly served with the Complaint in this action, as set forth in the previously filed Affidavit of Service of Process.

**WHEREFORE**, Plaintiffs request that default be entered on the docket in the above-captioned matter in their favor and against Defendant, Al'An El Maintenance Corp.

Respectfully submitted,

Date: August 9, 2002

**O'DONOGHUE & O'DONOGHUE**

Constitution Place, Suite 515  
325 Chestnut Street  
Philadelphia, PA 19106  
Telephone (215) 629-4970  
Facsimile (215) 629-4996

By:

Robert P. Curley  
Attorney I.D. No. 55760

By:

David D. Capuano  
Attorney I.D. No. 70238

Attorneys for Plaintiffs